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Counsel to the Ad Hoc Group of Non-Consenting States

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re

PURDUE PHARMA L.P., *et al.*,

Debtors.¹

Chapter 11

Case No. 19-23649 (RDD)

(Jointly Administrated)

**VERIFIED STATEMENT OF THE AD HOC GROUP
OF NON-CONSENTING STATES PURSUANT TO BANKRUPTCY RULE 2019**

Pursuant to Rule 2019 of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), the Ad Hoc Group of Non-Consenting States (the “**Ad Hoc Group**”) holding general unsecured claims in the above captioned chapter 11 cases, by and through its undersigned counsel,

¹ The Debtors in these cases, along with the last four digits of each Debtor’s registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrum Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF LP (0495), SVC Pharma LP (5717) and SVC Pharma Inc. (4014). The Debtors’ corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

hereby submits this verified statement (the “**Statement**”) and states as follows:

1. In September 2019, Pillsbury Winthrop Shaw Pittman LLP (“**Pillsbury**”) provided limited preliminary advice to several members of the Ad Hoc Group regarding various bankruptcy-related issues involving the potential settlement of various states’ claims against Purdue Pharma L.P. and its affiliates (collectively, the “**Debtors**”) and members of the Sackler family (the “**Sacklers**”).

2. On September 15, 2019, the Debtors filed these chapter 11 cases. The states that did not reach pre-petition agreement with the Debtors and the Sacklers about the general contours of a potential chapter 11 plan decided that it was in their collective and strategic interests to form an informal group of states.

3. In October 2019, the Ad Hoc Group entered into an agreement for Pillsbury to represent it in connection with the Debtors’ chapter 11 cases from before the commencement of these cases.

4. As of the date hereof, Pillsbury represents only the Ad Hoc Group. Pillsbury does not represent or purport to represent any other entities or states in connection with these chapter 11 cases. Pillsbury does not represent the Ad Hoc Group as a “committee” (as such term is used in the Bankruptcy Code and the Bankruptcy Rules) and does not undertake to represent the interests of, and is not a fiduciary for, any creditor, party in interest, or other entity that has not signed a retention agreement with Pillsbury. In addition, the Ad Hoc Group does not represent or purport to represent any other entities in connection with the Debtors’ chapter 11 cases.

5. The members of the Ad Hoc Group hold claims against the Debtors’ estates. In accordance with Bankruptcy Rule 2019, a list of the names, addresses and the “nature and amount of all disclosable economic interests” held in respect of the Debtors as of October 4, 2019, by each member of the Ad Hoc Group is attached hereto as **Exhibit A**.

6. The information set forth in **Exhibit A**, which is based on information provided by the applicable members of the Ad Hoc Group to Pillsbury, is intended only to comply with Bankruptcy

Rule 2019 and is not intended for any other purpose. Pillsbury does not make any representation regarding the validity, amount, allowance, or priority of such claims and reserves all rights with respect thereto.

7. Nothing contained in this Statement (or Exhibit A) should be construed as a limitation upon, or waiver of, any rights of any member of the Ad Hoc Group to assert, file and/or amend their claims in accordance with applicable law and any orders entered in these chapter 11 cases.

8. Pillsbury reserves the right to amend and/or supplement this Statement in accordance with Bankruptcy Rule 2019.

Dated: October 11, 2019

Respectfully submitted,

PILLSBURY WINTHROP SHAW PITTMAN LLP

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